

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

GALLERIA 2425 OWNER, LLC,
Debtor.

Bankruptcy Case No. 23-34815-jpn

2425 WL LLC,
Appellant,

Civil Action No. 24-cv-01746

v.

CHRISTOPHER R. MURRAY,
TRUSTEE, NATIONAL BANK OF
KUWAIT, S.A.K.P., NEW YORK
BRANCH.
Appellees.

DECLARATION OF R. J. SHANNON

I, Robert Joseph Shannon, declare as follows:

1. My name is Robert Joseph Shannon. I am known personally and professionally as “R. J. Shannon.” I am a partner at the law firm of Shannon & Lee LLP, which has been employed as attorney for Christopher R. Murray (the “Trustee”) in his role as chapter 11 trustee and trustee of the liquidation trustee in connection the above-captioned matters.

2. Except as otherwise noted, all facts set forth in this declaration are based upon my personal knowledge. If called upon to testify, I would testify competently to the facts set forth in this Declaration.

3. **Exhibit 1** attached to the Trustee's motion to supplement the record (the "Motion") is a true and correct copy of the transcript of the September 6, 2024, hearing on the Trustee's objection to the claim of 2425 WL LLC.

4. **Exhibit 2**, **Exhibit 3**, **Exhibit 4**, **Exhibit 5**, **Exhibit 6**, and **Exhibit 9** to the Motion are true and correct copies of the documents indicated that are filed on the docket in In re Galleria 2425 Owner, LLC, Case No. 23-34815, pending before the U.S. Bankruptcy Court for the Southern District of Texas.

5. **Exhibit 7** to the Motion is a true and correct copy of the order dismissing 2425 WL, LLC v. National Bank of Kuwait, S.A.K.P., New York Branch, Adversary Proceeding No. 24-03043, pending before the U.S. Bankruptcy Court for the Southern District of Texas.

6. **Exhibit 8** to the Motion is a true and correct copy of the docket sheet for Adversary Proceeding No. 24-03043, as it was reflected on September 16, 2024.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 18, 2024.

By: 
Robert Joseph Shannon